

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p>K&amp;L Gates LLP One Newark Center 1085 Raymond Boulevard, 10th Floor Newark, NJ 07102 Telephone: (973) 848-4000 Facsimile: (973) 848-4001 Daniel M. Eliades, Esq. (DME-6203) David S. Catuogno, Esq. (DSC-1397) Caitlin C. Conklin, Esq. (CCC-5117)</p> <p><i>Proposed Special Counsel for the Debtors and Counsel for non-debtor Plaintiffs</i></p>	
<p>In re:</p> <p>Supor Properties Enterprises LLC, <i>et al.</i><sup>1</sup>,</p> <p style="text-align: center;">Debtors.</p>	<p>Case No. 24-13427 (SLM)</p> <p>Judge: Stacey L. Meisel</p> <p>Chapter 11</p> <p>(Joint Administration Requested)</p>
<p>Supor Properties Enterprises LLC; J Supor 136-1 Realty LLC; Supor-172 Realty LLC; Supor Properties 600 Urban Renewal, LLC; JS Realty Properties, LLC; Supor Family LLC; Supor Properties-400 Limited Liability Company; and the Marital Trust under the Last Will and Testament of Joseph Supor, Jr.,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>American Dream Resorts, Ltd., RDA1: Supor Properties Enterprises LLC; RDA 2&amp;3: Supor</p>	<p>Adv. Pro. No. 24-01174 (SLM)</p> <p><b>ORDER TO SHOW CAUSE FOR INJUNCTION AGAINST DISPOSITION OF DEEDS TO REAL PROPERTIES AND FOR EJECTMENT OF DEFENDANT PARTIES FROM OCCUPANCY OF PROPERTY</b></p>

<sup>1</sup> The Debtors in these related chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: Supor Properties Enterprises LLC (5580); J Supor 136-1 Realty LLC (3205); Supor-172 Realty LLC (EIN No. 5662); Supor Properties Breiderhoft LLC (7258); Supor Properties Devon LLC (6357); Shore Properties Associates North LLC (6707); Supor Properties 600 Urban Renewal, LLC (8604); JS Realty Properties, LLC (2497); and Supor Properties Harrison Avenue, LLC (1728).

Properties Enterprises LLC; RDA 4: J Supor 136-1Realty LLC; RDA 5: Supor 172 Realty LLC; RDA 6: Supor Properties 600 Urban Renewal, LLC; Supor Studio City 2 LLC, Supor Studio City 3 LLC; Supor Studio City 4 LLC and Supor MT, LLC  Defendants.	
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The relief set forth on the following pages, numbered three (3) through six (6), is hereby  
**ORDERED**

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Caption: ORDER TO SHOW CAUSE FOR INJUNCTION AGAINST DISPOSITION OF DEEDS TO REAL PROPERTIES AND FOR EJECTMENT OF DEFENDANT PARTIES FROM OCCUPANCY OF PROPERTY

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THIS MATTER having been presented to the Court by Plaintiffs Supor Properties Enterprises LLC; J Supor 136-1 Realty LLC; Supor-172 Realty LLC; Supor Properties 600 Urban Renewal, LLC; JS Realty Properties, LLC; Supor Family LLC; Supor Properties-400 Limited Liability Company; and the Marital Trust under the Last Will and Testament of Joseph Supor, Jr., (each a “Plaintiff” and collectively, the “Plaintiffs”), by their Verified Complaint against Defendants American Dream Resorts, Ltd.; RDA 1: Supor Properties Enterprises LLC; RDA 2&3: Supor Properties Enterprises LLC; RDA 4: J Supor 136-1 Realty LLC; RDA 5: Supor 172 Realty LLC; RDA 6: Supor Properties 600 Urban Renewal, LLC, Supor Studio City 2 LLC; Supor Studio City 3 LLC; Supor Studio City 4 LLC; and Supor MT, LLC (each a “Defendant” and collectively the “Defendants”) seeking, *inter alia*, emergent injunctive relief (i) enjoining Defendants from any further transfer, assignment, encumbrance, recording or other disposition of any of the Contributed Deeds<sup>2</sup> and/or the underlying OA Deeded Properties, including the Manor Avenue Property; and (ii) declaring that the automatic stay of 11 U.S.C. § 362 is in effect as to the interests of all Debtor Plaintiffs as to the Contributed Deeds by each Debtor and the corresponding OA Deeded Properties; (iii) requiring the turnover and/or accounting for all Contributed Deeds; and (iv) requiring turnover of possession of the JS Realty Property and otherwise ejecting and removing ADR and/or any other Defendant(s) from use, possession and/or occupancy of the JS Realty Property; and the Court having reviewed the Verified Complaint and the pleadings submitted

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Verified Complaint, Supor First Day Declaration and/or the April 7 Supor Declaration, as appropriate.

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therewith, including the Declaration of Joseph Supor dated April 7, 2024 (the “April 7 Supor Declaration”), and the First Day Declaration of Joseph Supor dated April 2, 2024 (the “Supor First Day Declaration”); and for other good cause shown; it is hereby

**ORDERED**, that:

1. Defendants shall show cause before the Honorable Stacey L. Meisel on \_\_\_\_\_ **2024 at** \_\_\_\_\_ **a.m./p.m.**, at 50 Walnut Street, Newark, New Jersey, Third Floor – Courtroom 3A, or as soon thereafter as counsel may be heard, why an order should not be issued (i) enjoining Defendants from any further transfer, assignment, encumbrance, recording or disposition of any of the Contributed Deeds and/or properties that are the subject of the Contributed Deeds, including the Manor Avenue Property; (ii) declaring that the automatic stay of 11 U.S.C. § 362 is in effect as to the interests of all Debtor Plaintiffs as to the Contributed Deeds by each Debtor and the corresponding OA Deeded Properties and (iii) requiring the turnover and/or accounting for all Contributed Deeds; and (iv) directing turnover of possession of the JS Realty Property to JS Realty and otherwise ejecting and removing Defendants from use, possession and/or occupancy of the JS Realty Property, located at 401 Supor Boulevard, Harrison, New Jersey pursuant to 11 U.S.C. §541 and 542 and/or otherwise ejecting the Defendants from any possession or occupancy of pursuant to N.J.S.A. 2A:35-1; 2A:39-1 and 2A:39-6.

2. Service of true copies of this Order together with (i) the Verified Complaint; (ii) Plaintiffs’ Memorandum of Law in Support of its Application by Order to Show Cause for Preliminary Injunction and Turnover of Estate Property; (iii) the April 7 Supor Declaration; and

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(iv) Proposed Order Enjoining Transfer, Assignment, Encumbrance, Recording or other Disposition of Contributed Deeds and Underlying Real Properties and Ejecting Defendants from Possession and Occupancy of JS Realty Property upon the Defendants shall be effectuated by Plaintiffs upon the Defendants and the United States Trustee within \_\_\_\_\_ of the date hereof by either (i) overnight mail plus regular mail; or (ii) personal service made by counsel for Plaintiffs or counsel's agent; or (iii) personal service in accordance with the rules of this Court, which service shall satisfy the requirements of the Federal Rules of Civil Procedure and the constitutional requirements of due process, notice, and the opportunity to be heard and shall be deemed good and sufficient service thereof and shall be deemed effective service of the Verified Complaint and that no summons shall be issued to the Debtor, but that process shall be the said service of this order and the Verified Complaint.

3. Plaintiffs shall file proof of said service on the docket in this matter no later than

\_\_\_\_\_.

4. Defendants shall file and serve upon the attorneys for Plaintiffs an Answer to the Verified Complaint within thirty (30) days after service of the Verified Complaint and this Order to Show Cause upon Defendants, exclusive of the date of service. Defendants shall file this Answer and Proof of Service in accordance with the rules of this Court. Notice is hereby given to the Defendants that upon its failure to file and serve an Answer to the Verified Complaint as aforesaid, judgment by default may be entered against it for the relief demanded in the Verified Complaint.

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5. Defendants' answering brief and/or other pleadings in opposition to Plaintiffs' Application by Order to Show Cause for Preliminary Injunction and Turnover of Estate Property, if any, be filed with this Court and served upon counsel for Plaintiffs no later than \_\_\_\_\_ days prior to the return date of this Order to Show Cause.